

**AKIN LAW GROUP PLLC**

45 BROADWAY  
SUITE 1420  
NEW YORK, NEW YORK 10006  
Tel. (212) 825-1400 Fax. (212) 825-1440

August 17, 2022

**Via ECF**

The Honorable Eric N. Vitaliano, U.S.D.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East, Courtroom 4C South  
Brooklyn, NY 11201-1804

**Re: *Fidan & Karagoz v. Istanbul Rego Park Inc., et al.***  
Case No. 22-CV-2252 (ENV) (SJB)

Dear Judge Vitaliano:

This firm represents Plaintiffs Fidan and Karagoz in the above-referenced matter. On August 12, 2022, Defendants filed a letter motion for a pre-motion conference regarding their anticipated motion to dismiss for failure to state a claim upon which relief can be granted.

The parties thereafter met and conferred, and write jointly to respectfully request a stay to permit the parties to engage in settlement discussions and conduct a mediation.

Accordingly, we respectfully request that the Court issue a Mediation Referral Order, referring this case to mediation through the Eastern District of New York, and to stay Plaintiff's deadline to respond to Defendants' letter motion *sine die* pending settlement and mediation efforts. We thank the Court for its time and attention to this matter.

Respectfully submitted,

**Akin Law Group PLLC**

*/s/ Robert D. Salaman*

---

Robert D. Salaman, Esq.  
45 Broadway, Suite 1420  
New York, NY 10006  
(212) 825-1400  
[rob@akinlaws.com](mailto:rob@akinlaws.com)

*Counsel for Plaintiffs*

cc: Emanuel Kataev, Esq.  
[emanuel@mlaborlaw.com](mailto:emanuel@mlaborlaw.com)  
*Counsel for Defendants*